



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APPENDIX II-5

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

BY CERTIFIED MAIL: RETURN RECEIPT REQUESTED

September 14, 1993

Dear Registrant:

SUBJECT: Additional Guidance about Worker Protection Standard  
Labeling Revisions to 2,4-D Labels

Registrants of 2,4-D end-use products have made several inquiries about the relationship between:

- PR Notice 93-7 (issued April, 1993) that contains instructions for revising labels to comply with the Worker Protection Standard for Agricultural Pesticides (WPS), and
- the letters (issued October 30, 1992 and January 14, 1993) to 2,4-D registrants with instructions for revising 2,4-D labels to comply with the 1992 agreement on exposure reduction measures for 2,4-D Labels.

EPA is issuing the enclosed additional guidance to registrants of 2,4-D products about revisions that must be made to the labels of end-use products containing 2,4-dichlorophenoxyacetic acid or any derivative of 2,4-dichlorophenoxyacetic acid (collectively referred to as "2,4-D" in the remainder of this letter) in order to comply with both PR Notice 93-7 and the 2,4-D agreement. If, after following the instructions in this additional guidance and in Supplement Three of PR Notice 93-7, you have questions or concerns about the required labeling revision for a 2,4-D end-use product, call the WPS Label Information Line (1-800-777-2185) for further assistance.

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NOTE: The enclosed guidance does NOT apply to those 2,4-D products that are outside the scope of the Worker Protection Standard, e.g. products primarily intended for home use, and products with uses only on noncrop areas, such as pastures and rangeland, rights-of way, and industrial sites). Such products must, however, comply with the 2,4-D agreement.

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The deadlines for completing these labeling revisions that are established by the 2,4-D agreement and by PR Notices 93-7 and 93-11 remain in effect. In addition, any requests to amend your product labeling in accordance with PR Notice 93-7 submitted after receipt of this additional guidance, must comply with the instructions in this guidance.

However, if you have already self-verified (in accordance with instructions in PR Notice 93-11) and printed revised 2,4-D labeling that complies with the 2,4-D agreement and PR Notice 93-7, and that newly printed labeling contains personal protective equipment requirements, engineering control statements, or user safety statements that differ from the statements this additional guidance would require, you:

- may sell or distribute the product with those revised labels, and
- must submit to EPA in accordance with the instructions in PR Notices 93-7 and 93-11, a request to amend your product labeling in accordance with this additional guidance, and
- must revise your end-use product labeling to comply with this additional guidance at the next label printing.

Registrants who, at time of receipt of this additional guidance, have already submitted to EPA an acceptable WPS

reflecting this additional guidance) generally will receive from EPA their 2,4-D labeling stamped "accepted with comments." The comments will indicate that, by the next printing, the labeling must be further revised in accordance with this additional guidance.

Sincerely,



T.E. Adamczyk, Head,  
Worker Protection Standard Implementation  
Deviant Response Evaluation Group  
Registration Division (H7505C)  
Office of Pesticide Programs

Enclosure

cc: All registrants of manufacturing-use products containing  
2,4-dichlorophenoxyacetic acid or any derivative of 2,4-  
dichlorophenoxyacetic acid

ADDITIONAL WPS GUIDANCE FOR REGISTRANTS OF 2,4-D

This guidance is for registrants of end-use products that:

- contain 2,4-dichlorophenoxyacetic acid or any derivative of 2,4-dichlorophenoxyacetic acid (collectively referred to as "2,4-D" in the remainder of this guidance) and are, therefore, amending the end-use product labeling to comply with the 1992 agreement on exposure reduction measures for 2,4-D labels (2,4-D agreement), and
- are within the scope of PR Notice 93-7 and are, therefore, amending the end-use product labeling to comply with PR Notices 93-7 and 93-11.

PERSONAL PROTECTIVE EQUIPMENT STATEMENTS

Use the instructions in PR Notice 93-7, Supplement Three, "Main Labeling Guidance," to determine the appropriate personal protective equipment (PPE) for your product, EXCEPT each 2,4-D product must contain a requirement for "protective eyewear." The PPE statements must be located under the subheading "Personal Protective Equipment:" in the Precautionary Statements section of the revised labeling as directed in PR Notice 93-7 Supplement Three and as shown on the "Product Worksheet" in Supplement Three-A.

Changes from 2,4-D agreement language:

--Do not use "eye protection (face shield or safety glasses)" as required by the 2,4-D agreement. Use the phrase "protective eyewear."

## WPS GUIDANCE FOR 2,4-D

--Do not use "When mixing, loading, or applying this product or repairing or cleaning equipment used with this product," as required by the 2,4-D agreement. Use the phrase required in PR Notice 93-7, Supplement Three. Usually the correct phrase will be "Applicators and other handlers must wear."

--Do not use "chemical-resistant gloves" as required by the 2,4-D agreement. Follow the instructions in PR Notice 93-7, Supplement Three which will guide you in selecting either "chemical-resistant gloves, such as \_\_\_\_\_, \_\_\_\_\_, or \_\_\_\_\_" and the appropriate chemical-resistance category letter (B,C,D,E,F,G, or H) OR "waterproof gloves."

--Do not use "long sleeved shirt, long pants, socks, and shoes" as required by the 2,4-D agreement, unless you are directed to by the instructions in PR Notice 93-7, Supplement Three. For example, most end-use products that are toxicity category II for acute dermal toxicity or skin irritation potential will be directed to use "coveralls over short-sleeved shirt and short pants, chemical-resistant footwear plus socks, chemical-resistant headgear for overhead exposure, and chemical-resistant apron when cleaning equipment, mixing, or loading."

--If your end-use product contains both uses within the scope of PR Notice 93-7 AND uses not within the scope of PR Notice 93-7, you have the option (described in Supplement Three of that notice) of splitting the personal protective equipment requirements into WPS PPE requirements and nonWPS PPE requirements. If you choose this option, the nonWPS PPE requirements on your revised labeling must be the PPE language required by the 2,4-D agreement for that nonWPS use.

If the end-use product is packaged in a container that is greater than 1 gallon, but less than 5 gallons, capacity AND the PPE statements established through the instructions in PR Notice 93-7

ADDITIONAL PPE STATEMENT FOR 1-5 GALLON CONTAINERS

do not require mixers and loaders to wear a chemical-resistant apron AND do not require "applicators and other handlers" to wear coveralls, add the following statement directly below the other PPE requirements:

"Mixers and loaders who do not use a closed mechanical system (probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE."

MECHANICAL TRANSFER FOR CONTAINERS OF 5 OR MORE GALLONS

If the end-use product is packaged in a container that is 5 gallons or more in capacity, the following statements must be placed on the product labeling:

"A closed mechanical system (probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. The mechanical system must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)]. The handler PPE requirements may be reduced or modified as specified in the WPS."

These statements about mechanical transfer must be located under the subheading "Engineering controls statements:" in the Precautionary Statements section of the revised labeling as

directed in PR Notice 93-7 Supplement Three and as shown on the "Product Worksheet" in Supplement Three-A.

#### OTHER ENGINEERING CONTROLS STATEMENTS

Do not add the statement "For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required" as required by the 2,4-D agreement. Instead, add the following statement:

"When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS."

The statement must be located under the subheading "Engineering controls statements:" in the Precautionary Statements section of the revised labeling as directed in PR Notice 93-7 Supplement Three and as shown on the "Product Worksheet" in Supplement Three-A. If the statements requiring the use of a mechanical transfer system are also to be added to the labeling:

- add this statement in a separate paragraph immediately below the statements requiring the mechanical transfer system, and
- delete the phrase "closed systems," in this statement.

USER SAFETY REQUIREMENTS

Add the appropriate user safety requirements to each 2,4-D label. These statements must be located in the Precautionary Statements section of the revised labeling as directed in PR Notice 93-7 Supplement Three and as shown on the "Product Worksheet" in Supplement Three-A.

1. Follow the directions in PR Notice 93-7, Supplement Three for whether to add the following statements (these statements are required if the end-use product is a concentrate and bears the signal word WARNING or DANGER):

"Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them."

2. All 2,4-D labels must add the following statements:

"Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned."

3. Do NOT add the following statements that were required by the 2,4-D agreement:

"Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands, face and arms with soap and water before eating, smoking, or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the

## WPS GUIDANCE FOR 2,4-D

previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."

### USER SAFETY RECOMMENDATIONS

Create a new labeling box on each 2,4-D label called "User Safety Recommendations." Place it in the section titled "Precautionary Statements -- Hazards to Humans & Domestic Animals" below the subsection titled "Engineering Control Statements" -- as shown on the "Product Worksheet" in Supplement Three-A of PR Notice 93-7. The User Safety Recommendations must be located in a clearly separate box -- with lines or other graphic indicators to separate them from the surrounding text. Put the following statements in the box:

#### User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENTRY RESTRICTIONS AND OTHER WPS STATEMENTS

1. Supplement Three of PR Notice 93-7 contains instructions for adding restricted-entry statements and other WPS-required statements to labels of products within the scope of PR Notice 93-7. It also contains instructions for removing statements from the current labeling that conflict with the WPS statements. For adding WPS-related statements and removing WPS-conflicting statements on your 2,4-D label other than those statements dealt with in this guidance, follow the instructions in Supplement Three of PR Notice 93-7.

2. The 2,4-D agreement covers certain labeling requirements, such as statements dealing with maximum application rates, that are not covered by the WPS but must be incorporated into 2,4-D labels. Follow the instructions in the 2,4-D agreement for incorporating onto the 2,4-D label the agreement-related statements not covered by this guidance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

14 JAN 1993

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

Dear State Pesticide Control Official:

As I informed you in my letter of October 30, 1992, a recent EPA requirement for revised labeling for technical and manufacturing-use products containing 2,4-dichlorophenoxyacetic acid or any derivative of 2,4-dichlorophenoxyacetic acid (collectively referred to as "2,4-D") will result in changes to pesticide labels submitted for Federal and State registrations. My letter to you also transmitted a copy of the October 30, 1992 letter which notified 2,4-D registrants of these changes, and a list of affected registrations.

Several errors in the October 30 letter and a minor change in protective clothing requirements subsequently negotiated by the Agency and the Industry Task Force II for 2,4-D Research Data necessitate the issuance of a correction letter addressed to the 2,4-D registrants and an extension in their deadline for submitting revised labeling to the Agency. The enclosed correction letter to registrants of 2,4-D products

1) corrects

a) page 2 of the October 30 letter to require that individual labels from a set of "split labels" must bear the most restrictive requirements for sites which are listed on the individual label, and

b) page 6 of the October 30 letter to change the date from October 23, 1992 to October 23, 1993 in the text of the certification of compliance,

2) revises glove requirements for certain users of 2,4-D liquid products on turf to be more consistent with previously existing, more protective requirements, and

3) extends the deadline for submission of revised labeling to the Agency until March 1, 1993.

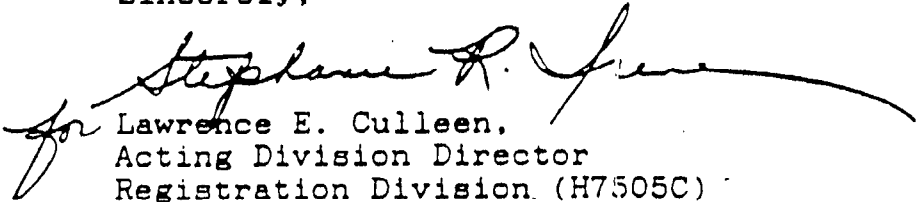
If you desire additional information about these corrections and changes, please contact your Regional Pesticide Office or:

Jill Bloom, Review Manager  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Special Review and Reregistration Division (H7508W)  
401 M St., S.W.  
Washington, D.C. 20460  
Telephone: (703) 308-8019

For information about the submission or review of revised labeling, please contact:

Joanne I. Miller, Product Manager 23  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division (H7505C)  
401 M St., S.W.  
Washington, D.C. 20460  
Telephone: (703) 305-7830

Sincerely,

  
for Lawrence E. Culleen,  
Acting Division Director  
Registration Division (H7505C)  
Office of Pesticide Programs

Enclosure--Correction letter to registrants of 2,4-D products



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 30 1982

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OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

BY CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Dear Registrant:

The Agency has approved requests for amended technical and manufacturing-use product registrations tendered by member companies of the Industry Task Force II for 2,4-D Research Data (the Task Force) which together embody an agreement on exposure reduction measures for those products containing 2,4-dichlorophenoxyacetic acid or any derivative of 2,4-dichlorophenoxyacetic acid (collectively referred to as "2,4-D" in the remainder of this letter). Your products containing 2,4-D and listed in the enclosure to this letter are formulated or repacked from products produced by one or more of the Task Force members and are therefore subject to the labeling revisions that are one component of the amended registrations. This letter establishes a date for your submission of revised labeling and provides you with information you will need in order to legally formulate your product from the technical and manufacturing-use products bearing revised labeling.

**LABELING REVISIONS**

Changes will be necessary to your product labels because the labeling on 2,4-D technical and manufacturing-use products produced by the Task Force members will be revised to include the following statement:

"This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions..."

Active ingredients covered by the amended registrations are: 2,4-Dichlorophenoxyacetic acid (2,4-D) and its derivatives; the sodium salt of 2,4-D, the diethanolamine salt of 2,4-D, the dimethylamine salt of 2,4-D, the isopropylamine salt of 2,4-D, the triisopropanolamine salt of 2,4-D, the 2-butoxyethyl ester of 2,4-D, the isooctyl (2-ethylhexyl) ester of 2,4-D, and the isopropyl ester of 2,4-D.

Revises the  
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followed by a schedule for implementation and the specific language you must include in your revised labeling for formulated products, both of which will be consistent with the information provided below.

The label revisions are designed to reduce exposure to mixers, loaders, applicators of 2,4-D products or others who might be incidentally exposed to 2,4-D. Because exposure patterns differ by use site, formulation type, and container size, different statements must appear on different labels. Where a product is used on more than one site type, the more restrictive language must appear on the product label. The same is true where more restrictive language exists on a product label prior to the implementation of the label revisions because of multiple active ingredients, "split labels," or existing maximum application rates; that is, the ~~most~~ most restrictive statements

~~apply.~~ REQUIREMENTS FOR SITES WHICH ARE LISTED ON THE INDIVIDUAL LABEL APPLY.

REVISIONS DEPENDENT ON THE REGISTERED USE(S) AND FORMULATION TYPE OF YOUR PRODUCT

Products registered for use on agricultural, industrial, and aquatic sites (including sod farms and forestry sites) must bear the following language: "When mixing, loading, or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical-resistant gloves, long-sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."

"Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands, face and arms with soap and water before eating, smoking, or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."

Products registered for use on agricultural sites (including sod farms and forestry sites) will bear the appropriate information on restricted entry intervals as required by the Worker Protection Standard, 40 CFR Parts 156 and 170, in accordance with the schedule designated in the Worker Protection Standard.

Products registered for use on pasture and rangeland must provide a maximum application rate for pasture and rangeland that is equivalent to the lower of 1) the existing application rate on your currently registered label or 2) 2 pounds 2,4-D acid equivalent per acre per application per site. Please note that you must not merely duplicate this statement on your revised labeling; you must specify the appropriate application rate for each product.

Products registered for forestry site preparation must provide a maximum application rate for forestry site preparation that is equivalent to the lower of 1) the existing application rate on your currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application per site. Please note that you must not merely duplicate this statement on your revised labeling; you must specify the appropriate application rate for each product.

Products registered for use on residential and other turf sites (excluding sod farms) must bear the following language: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled."

Products registered for use on residential and other turf sites (excluding sod farms) must provide a maximum application rate for turf that is equivalent to the lower of 1) the existing application rate on your currently registered label or 2) 2 pounds 2,4-D acid equivalent per acre per application per site. Please note that you must not merely duplicate this statement on your revised labeling; you must specify the appropriate application rate for each product.

Products registered for use on residential and other turf sites (excluding sod farms) must bear the following language: "The maximum number of broadcast applications per treatment site is 2 per year."

Products registered for use on residential and other turf sites (excluding sod farms), products applied in dry form only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."

"After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."

Products registered for use on residential and other turf sites (excluding sod farms), products applied in liquid form only must bear the following language: "After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower."

Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course, amine products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves."

Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course, amine products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."

Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves."

Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."

Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves."

Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."

## REVISIONS DEPENDENT ON THE SIZE OF PACKAGING

Containers over 1 gallon and less than 5 gallons in capacity must bear the following language: "Persons engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron."

Containers of 5 gallons or more in capacity must bear the following language: "A mechanical system (probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal."

## SCHEDULE FOR IMPLEMENTING CHANGES

### REQUIREMENTS FOR REVISED LABELING OF TASK FORCE PRODUCTS FROM WHICH OTHER 2,4-D PRODUCTS ARE FORMULATED

The members of the Task Force are required to submit revised labeling for their technical and manufacturing-use products subject to the amended registrations by October 30, 1992. These revised labels will be reviewed by the Agency by December 15, 1992. All Task Force technical and manufacturing-use product sold or distributed after June 15, 1993 must bear the revised labeling. As noted above, the revised labeling on these products sold and distributed by the Task Force members will include the following statement:

"This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions..."

followed by a schedule for implementation and the specific language you must include in your revised labeling for formulated products, both of which will be consistent with the information provided in this letter.

### REQUIREMENTS FOR SUBMISSION AND IMPLEMENTATION OF REVISED LABELING FOR YOUR PRODUCTS LISTED IN THE ENCLOSURE TO THIS LETTER

The Task Force technical and manufacturing-use products you purchase between December 15, 1992 and June 15, 1993 may bear revised labeling. After June 15, 1993, these products are required to bear such labeling. The revised labeling on the Task Force technical and manufacturing-use products you purchase will indicate the dates by which products formulated from them must bear the appropriate label revisions. This letter provides advance notice so that you can prepare for the necessary changes.

The date for implementing revised labeling for each of your products depends on the uses for which it is registered. Products registered for use on sites other than residential or turf (including sod farms) and produced after October 23, 1993 must bear revised labeling; products registered for use on these sites and sold or distributed by any registrant after April 15, 1994 must bear revised labeling. Products registered for use on residential or turf sites (excluding sod farms) and produced after June 15, 1994 must bear revised labeling; products registered for use on these sites and sold or distributed by any registrant after January 1, 1995 must bear revised labeling.

The certification of compliance shall state:

"I, being an authorized representative of [company name], certify that all containers of [product name and registration number] produced by [enter October 23, 199<sup>3</sup>X for] products registered for use on sites other than residential or turf, including sod farms; enter June 15, 1994 for products registered for use only on residential or turf sites, excluding sod farms; for products with both types of uses, enter the earlier date] will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products. I further certify that all containers of said product sold or distributed by this company by [enter April 15, 1994 for products registered for use on sites other than residential or turf, including sod farms; enter January 1, 1995 for products registered for use only on residential or turf sites, excluding sod farms; for products with both types of uses, enter the earlier date] will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products."

Please note that you must not merely duplicate this statement in your certification; you must select the dates appropriate to the registration for which you are offering the revised labeling. This statement must be signed by an authorized representative of the company, dated, and submitted to the individual and address shown at the end of this letter by MARCH 1, 1993. ~~January 30, 1993~~ Copies of revised labeling will not be accepted nor processed by the Agency without the accompanying certification of compliance. Because the required labeling revisions are explicitly stated in this letter, the Agency will not review the revised labeling submissions, but will only monitor the receipt of the submissions. Therefore, any additional label revisions not stated in this letter should be handled as a separate amendment and not included with your certification package. The certifications of compliance together with the appropriately revised labeling copies will function as approved copies of the label.

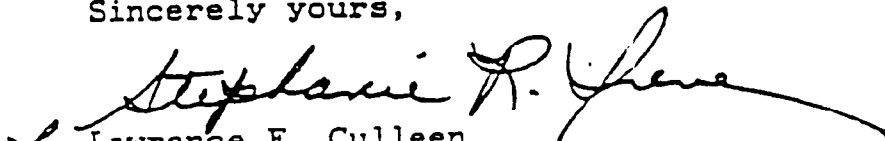
The Agency will not automatically acknowledge receipt of your revised labeling and certifications of compliance. If you desire an acknowledgement, you must include a stamped, self-addressed postcard which identifies the individual registrations for which you believe you have submitted appropriately revised labeling and certifications.

## CONTACTS

Certification statements and revised labeling should be mailed to the individual and address below. Questions about your submission or the revised labeling may also be directed to:

Joanne I. Miller, Product Manager 23  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division (H7505C)  
401 M St., S.W.  
Washington, D.C. 20460  
Telephone: (703) 305-7830

Sincerely yours,

  
for Lawrence E. Culleen,  
Acting Division Director  
Registration Division (H7505C)  
Office of Pesticide Programs

Enclosure

